

Meeting Minutes Transmittal

PNL NON-OPERATIONAL UNITS
Project Managers Meeting
Ecology, Kennewick Office
Room 8
Kennewick, Washington

November 8, 1995
2:30 p.m. to 3:30 p.m.



The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated Project Managers Meeting.

Charles R. Delannoy Date: 12/7/95
Charles R. Delannoy, Project Manager, RL

Jeanne J. Wallace Date: 12/7/95
Jeanne J. Wallace, Project Manager, Washington State Department of Ecology

PNL Non-Operational Units, PNL Concurrence

Michael H. Schlender Date: 12/7/95
Michael H. Schlender, Contractor Representative, PNL

Purpose: Discuss Closure Process

Meeting Minutes are attached. The minutes are comprised of the following:

- Attachment 1 - Agenda
- Attachment 2 - Summary of Discussion and Commitments/Agreements
- Attachment 3 - Attendance List
- Attachment 4 - Action Items
- Attachment 5 - DRAFT Ecology questions/clarifications for the Thermal Test Facility
- Attachment 6 - Section 5.0, Procedural Closure submittal for the Thermal and Physical/Chemical Treatment Test Facilities
- Attachment 7 - Lessons Learned Summary

ATTACHMENT 1

PNL NON-OPERATIONAL UNITS
Project Managers Meeting
Ecology - Kennewick Office, Room 8
Kennewick, Washington

November 8, 1995
2:30 p.m. to 3:30 p.m.

Agenda

1. Approval of past meeting minutes (Ecology/RL/PNL)
 2. Status of Procedural Closure Requests Review for the Thermal and Physical/Chemical Treatment Test Facilities (Ecology)
 3. Schedule and Status of PNL Internal Procedural Closure Package for Biological Treatment Test Facilities (RL/PNL)
 4. Physical/Chemical Treatment Unit Procedural Closure Submittal Summary
 5. Discussion on tour of units for Ecology Administration
 6. Results of October 25th Ecology Part A field visit (Ecology/RL/PNL)
 7. Status Action Items (Ecology/RL/PNL)
 - New Action Items
 - Old Action Items
- 09-20-95 Review UMMs determine the first 325 HWTU Unit Manager Meeting in which procedural closure was discussed.
ACTION: Day/Lutter/Tilden (PNL)
- 10-18-95:1 DSI to transmit documents to the Administrative Record
ACTION: D Lutter (PNL)
- 10-18-95:2 J Wallace (Ecology) to submit list of comments on the Thermal and Physical/Chemical Procedural Closure. D Lutter (PNL) will track via NOD type table
ACTION: J Wallace (Ecology)/D Lutter (PNL)
- 10-18-95:3 Schedule meeting with J Wallace (Ecology), C Delannoy (RL), M Schlender (PNL) and D Lutter (PNL) to discuss PMP and Thermal Procedural Closure activities.
ACTION: D Lutter/M Schlender (PNL)
- 10-18-95:4 Comments on "Lessons Learned" summary to C Delannoy by October 27th, incorporate comments and attach to the minutes
ACTION: C. Delannoy (RL)
- 10-18-95:5 Letter to Ecology summarizing understanding and agreement that no TPA revision is needed since submission of the Procedural Closure package will meet the intent of M-20-44 TPA Milestone Deliverable
ACTION: H Tilden (PNL)
- 10-18-95:6 Investigate establishment of an Ecology turn-a-round office in the 300 Area
ACTION: C Delannoy (RL)
8. General Discussion (Ecology/RL/PNL)
 9. Next Unit Managers Meeting (Ecology/RL/PNL)
 - Proposed December 6 date
 - Proposed topics

Attachment 2

PNL NON-OPERATIONAL UNITS
Project Managers Meeting
Ecology - Kennewick Office
Room 8
Kennewick, Washington

November 8, 1995
2:30 p.m. to 3:30 p.m.

Summary of Discussion and Commitments/Agreements

1. Approval of Past Unit Managers Meeting Minutes: The minutes of the October 18 UMM were reviewed and approved by the Ecology and RL Project Managers and the PNL Contractor Representative.
2. Status of Procedural Closure Requests Review for the Thermal and Physical/Chemical Treatment Test Facilities: Jeanne provided a copy of a draft set of comments/clarifications on the Thermal package (Attachment 5). A similar set of comments may be expected for the Physical/Chemical package. She plans to transmit the finalized comments informally by cc:Mail (soon) and formally later, so that a copy may be inserted into the Administrative Record.
3. Schedule and Status of PNL Internal Procedural Closure Package for Biological Treatment Test Facilities: Mike Schlender (PNL Contractor Representative) gave a status report. Internal comments on the transmittal are currently being received. Currently there is a 7-day slip in the baseline schedule, which is cutting into RL's review time. Some of the internal comments received require editing of the package. All certifications from the original distribution of the internal certification packages have been received. Records review is also complete. Most bench-scale work which matched the process activities described in the Biological Form 3 was performed between 1989 and 1991. The 200-ZP-1 demonstration project is the only ongoing item of interest.

Mike also reported that he had an action resulting from an October 31 meeting with Jerry Yoke (Ecology) to discuss the ISV test site report included in the Thermal procedural closure package. Backup data packages for the analytical work reported in the ISV test plan have been located. ACTION: Mike will provide this information to Jerry Yoke to complete that action item. Jeanne was interested in the information that the block from the test has been excavated, and that the hole was backfilled with clean soil. EPA is also interested in this information. ACTION: Jeanne requested that RL/PNL provide a report describing their findings in this regard, and Mike Schlender will prepare one. Part of the issue deals with adding this unit to the 300-FF-2 operable unit work plan, which is almost finalized.

4. Physical/Chemical Treatment Unit Procedural Closure Submittal Summary: Delores Lutter (PNL) distributed a copy of the procedural closure submittal for the Thermal and Physical/Chemical Treatment Test Facilities (Attachment 6) to address a concern expressed informally by

Jeanne concerning the text of the Physical/Chemical summary, Section 4.0, second paragraph. The language could be read to imply that RL/PNL are certifying that waste treatment DID take place, not that such treatment did NOT take place. Jeanne stated that the language did not need to be changed for now. Mike asked that any desired changes be brought to RL/PNL's attention so that any perceived error is not repeated in the Biological procedural closure package.

5. Discussion on tour of Units for Ecology Administration: Jeanne asked that this tour be delayed indefinitely. Ecology administration does not currently plan to participate in a tour.
6. Results of October 25th Ecology Part A field visit: A report is currently being formulated by Laura Russell. Jeanne has not yet read the report.
7. Status Action Items:

NEW ACTION ITEMS

- 11-08-95:1 Mike Schlender to meet with Jerry Yokel to provide data package information on testing reported in ISV test report.
- 11-08-95:2 Mike Schlender to provide a report describing the current layout and status of the ISV test site, highlighting the differences between the description in the Part A, Form 3 and the site as it currently exists.

OLD ACTION ITEMS

- 9-20-95:1 CLOSED (See 325 PMM minutes)
- 10-18-95:1 RL to transmit documents to Administrative Record shortly. OPEN
- 10-18-95:2 OPEN. Delores to track draft transmitted in this meeting on NOD-type table.
- 10-18-95:3 Agreed that meeting is not presently needed. CLOSED
- 10-18-95:4 No comments were provided to Bob; the summary will be attached to this meeting's minutes. CLOSED (Attachment 7)
- 10-18-95:5 Draft is in internal review at PNL. OPEN
- 10-18-95:6 Mary Vargas noted during the 324 Project Managers Meeting following that Jeanne has been given a turnaround office in EESB, and also can utilize 3701-U as desired. CLOSED

8. General Discussion:

A brief discussion of the procedural closure process was held. Jeanne indicated that people with concerns about the process should feel free

to contact her. She doesn't think the closure process would be more economical or easier than the current process.

9. Next Unit Managers Meeting: Will be changed to Dec. 7. No new topics were suggested.

PNL Non-Operational Units
Project Managers Meeting
Ecology - Kennewick Office
Room 8

Attendance List

[illegible]

Attachment 4

PNL NON-OPERATIONAL UNITS
Project Managers Meeting
Ecology - Kennewick Office
Room 8
Kennewick, Washington

November 8, 1995
2:30 p.m. to 3:30 p.m.

Action Items

<u>Action Item #</u>	<u>Description</u>
10-18-95:1	RL to transmit documents to Administrative Record ACTION: C. Delannoy (RL)
10-18-95:2	NOD Table for tracking questions/clarifications ACTION: D. Lutter (PNL)
10-18-95:5	Letter to Ecology summarizing understanding and agreement that no TPA revision is needed ACTION: H. Tilden (PNL)

Attachment 5

PNL NON-OPERATIONAL UNITS
Project Managers Meeting
Ecology - Kennewick Office
Room 8
Kennewick, Washington

November 8, 1995
2:30 p.m. to 3:30 p.m.

Procedural Closure Certification Questions/Clarifications
for the
Thermal Treatment Test Facility
DRAFT November 8, 1995

DRAFT

The following is a list of questions generated from Ecology's review of the closure certifications for the Physical and chemical Treatment Test facilities and Thermal Treatment Test Facility. The certifications were transmitted in the DOE letter "Modification of the Hanford Facility Dangerous Waste Part A Permit To Address Procedural Closure of the Thermal and Physical/Chemical Treatment Test Facilities" dated September 22, 1995.

Cover Letter

1. Letter, second paragraph: States "did not identify any future activities for the units."

Please clarify statement. It is assumed that no future interim status activities will be conducted at these facilities. Specify if these facilities will discontinue to operate.

2. The letter omits public involvement from the closure process for these units. Ecology will initiate public involvement as described in WAC 173-303-840.

No response necessary. But PNL and DOE must be prepared to allocate resources as necessary to support the public involvement process.

3. The letter fails to copy the administrative record for these units. Please verify that this letter is transmitted to the administrative record. Public comment will not be initiated until the administrative record is complete.

Thermal Treatment Certification

4. Page 1, Section 1.1. The TPA only allows procedural closure of units which never managed waste except as provided by WAC 173-303-200 (accumulation) and 173-303-802 (permit by rule). Please explain why WAC 173-303-071(l) and (s) are cited in regard to waste management activities conducted at the facilities. Explain why such activities should not preclude the procedural closure of the unit.

5. Page 1, Section 2.0. The phrase "600 Area In-Situ Vitrification (ISV) test site" is not consistent with Appendix C of the TPA (300-FF-2, 300 Vitrification Test Site). Please distinguish between the 400 and 600 Areas of the Hanford Site and verify the statement is correct.

6. Page 1, Section 2.0. Provide all titles for the 116-B-6-1 crib and the operable unit in which it is located. The TPA Appendix C which refers to the 116-B-6A crib located in the 100-BC-1 Operable Unit. Verify if this is the same crib referred to in the Part A and certification.

7. Page 2, Section 3.1. The TPA only allows procedural closure of units which never managed waste except as provided by WAC 173-303-200 (accumulation) and 173-303-802 (permit by rule). Please explain why WAC 173-303-071(l) and (s) are cited in regard to waste management activities conducted at the facilities. Explain why such activities should not preclude the procedural closure of the unit.

Clarify the statement "Thermal treatment test activities ... performed ...with ... samples for characterization."

8. Page 2, Sections 3.2 and 3.2.1. These sections refer to an Administrative Record Inventory or administrative controls/records.

DRAFT

Specify if this is the administrative record required by the TPA, Section 9.4 Administrative Record. Specify if the information contained in the "administrative record" referred to in the certification will be incorporated into the TPA administrative record. If not, explain in detail why not. Clarify if, and how, Ecology will access this information.

9. Page 2, Sections 3.2.1. Please provide copies of RL/PNL Memorandum of Agreement dated 8/15/88; PNL-MA-8, chapter 14 dated 8/88; and PNL internal documents referenced in this section. Specify if this information has been incorporated into the TPA administrative record.

10. Page 3, Section 3.2.1. Please provide Ecology with copies, or at a minimum access, to the documents listed on page 3.

11. Page 3, Section 3.2.1. Specify if the on-site review of all facilities was conducted by RL and PNL independent of those performed by Ecology for the purpose of this closure.

12. Page 3 and 4, Section 3.2.2. The TPA only allows procedural closure of units which never managed waste except as provided by WAC 173-303-200 (accumulation) and 173-303-802 (permit by rule).

Please explain why WAC 173-303-050 (department of ecology cleanup authority), -145 (spills and discharges to the environment), and -960 (special powers and authority of the department) are cited in regard to waste management activities conducted at the facilities. Explain why such activities should not preclude the procedural closure of the unit.

13. Page 4, Records Review. Provide copies, or describe in detail, the institutional controls [that] would have required PNL staff involved in treatment technology testing to have approval from PNL staff knowledgeable of WAC requirements before initiation of the project.

14. Page 4, Records Review. Provide describe in detail, controls [which] would also ensure that proper notification of regulated activities would be recorded.

15. Page 4, Records Review. Specify why only 1830 projects records were searched.

16. Page 5, Records Review. Explain why the records are limited to conditions noted during the period 1990-1995.

17. Page 5, Certifications Requests. EXPLAIN the statement "the information provided showed that treatment testing did occur in PNL facilities during period from 1988-1995; however this activity was either conducted under another regulatory authorization (CERCLA Treatability Study, interim status Unit - Part B, Closure plan)...."

Provided a list of exactly what activities occurred under interim status Unit - Part B, Closure plan. Provide titles of Part A's, Part B's, and closure plans. Do the same for the CERCLA activities and documentation.

18. Page 6, Field Evaluations. Provide a list of field inspections conducted in regard to this closure and specifying the organization which performed them.

19. Page 6, Section 3.3. Describe the management of waste residues generated from CERCLA Treatability tests.

20. Administrative Record Summary. Specify if this is the administrative record required by the TPA, Section 9.4 Administrative Record. Specify if the information contained in the "administrative record" referred to in the certification will be incorporated into the TPA administrative record. If not, explain in detail why not. Clarify if, and how, Ecology will access this information. Explain the volume and section headings.

DRAFT

21. Thermal Treatment Test Facilities, Fact Sheet, Background. Please provide a copy of the agreement between EPA, DOE and Ecology to allow Battelle a means of allowing research on a larger scale would benefit to environment cleanup resulting in the Treatability study based interim status permits.

22. Thermal Treatment Test Facilities, Fact Sheet, Closure. Correction. One closure plan would be required for each Part A, *not* each technology and location listed on the interim status permit.

23. Thermal Treatment Test Facilities, Fact Sheet, Closure. Explain the phrase "... to the satisfaction of DOE-RL and Ecology." It must be established that thermal treatment activities did not occur - period.

[REDACTED]

Attachment 6

PNL NON-OPERATIONAL UNITS
Project Managers Meeting
Ecology - Kennewick Office
Room 8
Kennewick, Washington

November 8, 1995
2:30 p.m. to 3:30 p.m.

Thermal Treatment Test Facilities
Procedural Closure
Technical Data Synopsis

not regulated as wastes and that the 1990 ISV Pilot Scale test did not constitute disposal (See Attachment C).

4.0 SUMMARY

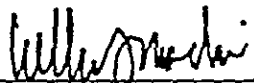
Thermal treatment test activities that have been conducted at the Hanford Site and that were subject to the Washington State Dangerous Waste Regulations, were conducted with simulants or with waste quantities falling within the treatability study sample exclusion. No activities have been conducted within the scope of the Thermal Treatment Test Facilities Part A Permit Application which require the preparation and submission of a Part B Permit Application, nor are any planned. RL and PNL request that procedural closure in accordance with Section 6.3.3 of the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Action Plan be implemented.

5.0 THERMAL TREATMENT TEST FACILITIES PROCEDURAL CLOSURE TECHNICAL DATA
SYNOPSIS CERTIFICATION

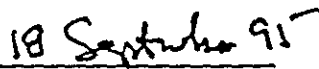
"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Owner/Operator
John D. Wagoner, Manager
U.S. Department of Energy
Richland Operations Office

Date



Co-operator
William J. Madia, Director
Pacific Northwest Laboratory



Date

Physical/Chemical Treatment Test Facilities
Procedural Closure
Technical Data Synopsis

Certifications were also received from two of the originators of the Part A applications filed in 1988. Information provided with these certifications reaffirmed that the filing of the Part A Application was protective in nature for activities which were largely "anticipated" and not actually planned.

Field Evaluations

Specific buildings and testing areas on the Hanford Site that were identified in the Part A Application were visited to determine if evidence remained of treatment activity that was regulated under the application. As outlined in the Part A Application, the field inspections were limited to the 116-B-6 Crib, the 300 West Area, and the 325, 324, and the 331 Buildings. As a result of these evaluations, numerous records were gathered to determine if secondary waste streams from existing treatment technologies are regulated under the Part A Application or if proper waste decontamination was performed to preclude waste storage following the completion of treatment testing. Based on the information gathered during and as a result of the field inspections, no treatment activity took place that would have required the Part A Application.

3.3 Waste Designation and Management

Waste residues from activities covered under the sample exclusion were returned to the generator and treatability test study exclusion residues were sent back the generator or managed in accordance with WAC 173-303 requirements and PNL waste-management practices. No treatment activities involving wastes above the treatability studies sample exclusion quantity limits have been conducted.

4.0 SUMMARY

Physical and chemical treatment test activities that have been conducted at the Hanford Site, and which were subject to the Washington State Dangerous Waste Regulations, were conducted with simulants or with waste quantities falling within the treatability study sample exclusion.

With the exception of operations in the 325 SAL (which now operates under the 325 Building Hazardous Waste Treatment Units Part A Application, Form 3), physical and chemical treatment test activities that have been conducted at the Hanford Site and that were subject to the Washington State Dangerous Waste Regulations, were conducted with simulants or with waste quantities falling

Physical/Chemical Treatment Test Facilities
Procedural Closure
Technical Data Synopsis

within the treatability study sample exclusion. No activities have been conducted within the scope of the Physical and Chemical Treatment Test Facilities Part A Application that require the preparation and submission of a Part B Application, nor are any planned. RL and PNL request that procedural closure in accordance with Section 6.3.3 of the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Action Plan be implemented.

5.0 PHYSICAL/CHEMICAL TREATMENT TEST FACILITIES PROCEDURAL CLOSURE
TECHNICAL DATA SYNOPSIS CERTIFICATION.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Owner/Operator
John D. Wagoner, Manager
U.S. Department of Energy
Richland Operations Office

Date

William J. Madia

Co-operator
William J. Madia, Director
Pacific Northwest Laboratory

18 September 95

Date

Attachment 7

PNL NON-OPERATIONAL UNITS
Project Managers Meeting
Ecology - Kennewick Office
Room 8
Kennewick, Washington

November 8, 1995
2:30 p.m. to 3:30 p.m.

Biological Treatment Test Unit Procedural Closure
October 4, 1995 Preliminary Discussions

SUMMARY OF DISCUSSION

Participants

Annette Barnard, DOE-RL
Bob DeLannoy, DOE-RL
Laura Russell, Ecology
Harold Tilden, PNL

Brian Day, PNL
Delores Lutter, PNL
Mike Schlender, PNL
Jeanne Wallace, Ecology

Purpose and Objectives

The purpose of the meeting was to review plans for the procedural closure of PNL's biological treatment test unit (BTTU) and prepare for formal kickoff of the process. Specific objectives were as follows.

- o Identify lessons learned while preparing the procedural closure packages for the physical/chemical treatment test unit and thermal treatment test unit for incorporation into planning and preparation of the procedural closure package for the BTTU.
- o Identify any significant issues concerning procedural closure of the BTTU.

Summary of Discussion

Mike Schlender (PNL) summarized the projected scope and level of effort required to submit a procedural closure package for the biological treatment test unit (BTTU). The data gathering and analysis is expected to require less effort than for the previous procedural closures. The procedural closure package is expected to be submitted to Ecology at the end of November 1995.

Ecology field inspection requirements were reviewed. Based on experience gained during the earlier procedural closures, the field inspection activities appear to be more effective after a substantial part of the data collection process has been completed. Jeanne Wallace (Ecology) suggested that their field inspection be initiated after the first round of principle investigator contacts is completed. This was projected to be about the end of October 1995. Laura Russell (Ecology) discussed the approach to the field inspection and stated that would focus more on field test sites, if any, than laboratory locations.

An issue with the TPA milestone language was identified and discussed. The current TPA milestones identifies the product as a Part B application and not a procedural closure. Background on this apparent discrepancy was reviewed and potential alternatives for resolving this issue were discussed. Jeanne Wallace took an action to seek additional information and guidance within Ecology.

Distribution:

M. A. Barnard	RL	14-40
R. C. Bowman	WHC	H6-24
R. M. Carosino	RL	A4-52
C. E. Clark	RL	A5-15
B. J. Day	PNL	P7-79
C. R. Delannoy	RL	A5-15
G. D. Hendricks	GSSC	B1-42
G. H. Fess	PNL	P7-79
D. K. Lutter	PNL	P7-79
S. M. Price	WHC	H6-23
M. H. Schlender	PNL	K6-25
H. T. Tilden II	PNL	P7-68
J. J. Wallace	Ecology	B5-18
RCRA Files	WHC	H6-24

ADMINISTRATIVE RECORD (Two Copies): PNL Non-Operational Units, T-X-1, T-X-2, and T-X-3. [Care of EPIC, WHC (H6-08)]

Washington State Department of Ecology Nuclear and Mixed Waste Hanford Files, P.O. Box 47600, Olympia, Washington 98504-7600

Please send comments on distribution list to D. K. Lutter (P7-79), (509) 376-5631.